REMARKS

This application has been reviewed in light of the Office Action dated October 3, 2005. In view of the foregoing amendments and the following remarks, favorable reconsideration and withdrawal of the rejections set forth in the Office Action are respectfully requested.

Claims 1 and 3-15 are pending. Claims 1, 4, 8, 13 and 14 have been amended. Support for the claim changes can be found in the original disclosure, and therefore no new matter has been added. Claims 1, 13 and 14 are in independent form.

Claim 14 was rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. In response to this rejection, Claim 14 has been amended. Withdrawal of this rejection is respectfully requested.

Claims 1, 3-7 and 9-15 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,269,336 (*Ladd et al.*).

Claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over *Ladd et al.* in view of Applicants' admitted prior art.

Without conceding the propriety of the rejections, the independent claims have been amended. Applicants submit that, for at least the following reasons, the amended independent claims are patentable over the cited art.

Independent Claim 1 recites, *inter alia*, rule identification information extraction means for extracting rule identification information from a document obtained by document obtaining means; rule selecting means for selecting a rule corresponding to the extracted rule identification information from among a plurality of rules based on the extracted rule

identification information stored in a rule memory, each of the plurality of rules specifying respective sections of voice output contents and voice input candidates in an obtained document; and document analyzing means for analyzing the document obtained by the document obtaining means based on the rule selected by the rule selecting means to extract voice output contents, voice input candidates, and designation information for designating a next processing object corresponding to each voice input candidate, from the respective sections of the obtained document specified by the rule selected by the rule selecting means. Each of independent Claims 13 and 14 recites similar or identical features.

Applicants submit that, for at least the following reasons, nothing in the cited art would teach or suggest at least the above-noted features recited in Claim 1.

*Ladd et al.* relates to a voice browser for interactive services and methods thereof. *Ladd et al.*'s invention employs a markup language document, which includes markup language elements identified by tags. The basic structure of the document is provided by a DIALOG element and STEP elements. The DIALOG element defines the scope of the document, and all other elements are contained in the DIALOG element. The STEP elements define states within a DIALOG element. A STEP element typically has an associated PROMPT element and INPUT element. The PROMPT element defines content to be presented to the user. The INPUT element defines a valid user input. The DIALOG element and associated STEP elements define a machine state that represents an interactive dialogue between the voice browser and the user. See Abstract and col. 16, line 29 - col. 18, line 65. A parser unit 302 receives such a markup language document from a network fetcher unit 300 and parses the information in the document according to syntax rules of the markup language. See col. 12, lines 17-20.

The Office Action cited col. 12, lines 18-20, col. 16, lines 12-18 and Fig. 6, and col. 41, lines 45-50 as teaching the rule selecting means, as that element stood prior to the instant Amendment, and col. 13, lines 55-59 as teaching the document analyzing means, as that element stood prior to the instant Amendment. In the Office Action dated July 16, 2004, at pages 2 and 3 thereof ("Response to Arguments"), the Examiner stated:

> Ladd et al. teach parsing the document based on the rules of the markup language (Col. 12, lines 18-20). As shown in Figure 6, the markup language document (XML) contains sections (inside <DIALOG> tags) that are the rules for interpreting the body of the document. It is inherent that each XML document will have at least one or more DIALOG sections, each covering a specific type of the machine-user dialog. This part of the XML document structure "reads on" the "plurality of rules" language in claim 1.
>
> Regarding the "rules each specifying respective voice output contents and voice input candidates," Figure 6 shows the <PROMPT> tags that provide "output contents" ("What meal would you like to hear the specials for?") and the <OPTION> tags which specify "input candidates" (Lunch, Breakfast, Dinner). Note that <INPUT TYPE = OPTIONLIST> elements may contain direct instructions to "fetch" additional list components via SQL calls (Col. 41, lines 45-50). Because of these commands, the software will inherently fetch the additional voice input or output contents/candidates (See the rest of the example code on Cols. 41-42). Finally, the interpreter unit parses each document based on the structure of the DIALOG sections (Col. 13, lines 52-59).

Applicants believe that the Examiner may continue to deem the above-cited portions of *Ladd et al.* and the above-quoted comments relevant to the above-noted elements of Claim 1 (rule identification information extraction means, rule selecting means, and document analyzing means), even though those elements have been subsequently amended. Accordingly, Applicants respectfully submit the following remarks regarding these citations and comments of the Examiner.

Applicants submit that nothing in *Ladd et al.*, including in particular the above-noted citations thereof and comments pertaining thereto made by the Examiner, would teach or suggest the rule identification information extraction means, rule selecting means or document

analyzing means as claimed in the combination of Claim 1, at least because *Ladd et al.* does not teach or suggest selecting a rule specifying respective sections of voice output contents and voice input candidates in an obtained document, corresponding to rule identification information extracted from an obtained document.

An example of such a rule and rule identification information is discussed in Applicants' specification beginning at page 11, line 21. As discussed therein, a rule is designated in accordance with the value of the attribute MODE of the <VB> tag in an HTML document. In the case of the HTML document shown in Fig. 5, the value is "H." The rule itself has been previously incorporated in the apparatus. The processing of the document according to the rule designated by "H" is described beginning at page 12, line 10. In the case of a different document, shown in Fig. 10, the value of the attribute MODE of the <VB> tag is "L." The processing of the document according to the rule designated by "L," which is different from the processing according to the rule designated by "H," is described beginning at page 13, line 2. At step S303 (Fig. 3), the document is analyzed to extract the contents of voice input/output in accordance with the rule that has been designated for that document. Processing differs depending on which rule has been designated, as explained at page 14, line 10 - page 15, line 20, for example, for the cases in which the rules designated by "H" and "L" are applied. The use of different rules permits the format of the voice interaction to be varied, even while the voice interaction is directed to achieve the same purpose or goal.

According to the invention of *Ladd et al.*, the rules of the markup language are generic rules that define how the system interprets the contents (elements, tags, attributes, values) of any particular markup language document. The system interprets the contents of a document

by applying its rules to those contents. Thus, those rules necessarily exist (e.g., are defined and stored by the system) independently of and external to any given document; they are not "in" any given document.

What is in the document is the objects (the contents – elements, tags, attributes, values) upon which the system operates, by applying its rules to those objects. Thus, the rules, e.g., define the different kinds of elements (DIALOG element, STEP element, etc.) and their respective attributes and specify how the system is to interpret them and the values assigned to them.

According to the invention of *Ladd et al.*, a document does not contain rule identification information, i.e., information identifying (specifying) a particular rule, from among a plurality of rules, on the basis of which the document is to be analyzed. Rather, all of the rules of the markup language apply to all the documents, because they are generic rules. While every document contains objects to which the rules can be applied, no document contains information singling out any one rule as the rule by which the document is to be analyzed. In contrast, according to Applicants' Claim 1, a document contains rule identification information (e.g., "H," "L") identifying a single rule which is applied to the document and not necessarily to other documents. Different documents are processed in different ways if they designate different rules.

Applicants understand that the Examiner's statement quoted above, namely, that "the markup language document (XML) contains sections (inside <DIALOG> tags) that are the rules for interpreting the body of the document" (emphasis added), does not accurately reflect the logic of the concept of a "rule," because it implies that the markup language rules are in the particular documents themselves and not in the system. According to such a view, it would not

be logically possible for the system, which lacks a mind to understand the rules, to acquire the rules from the documents and then use the rules to interpret the documents. Thus, on such a view, the documents would effectively be interpreting themselves.

For at least the reasons set forth above, Applicants submit that *Ladd et al.* does not teach or suggest selecting a rule specifying respective sections of voice output contents and voice input candidates in an obtained document, corresponding to rule identification information extracted from an obtained document. On at least this basis, Applicants submit that *Ladd et al.* does not teach or suggest rule identification information extraction means for extracting rule identification information from a document obtained by document obtaining means; rule selecting means for selecting a rule corresponding to the extracted rule identification information from among a plurality of rules based on the extracted rule identification information stored in a rule memory, each of the plurality of rules specifying respective sections of voice output contents and voice input candidates in the obtained document; and document analyzing means for analyzing the document obtained by the document obtaining means based on the rule selected by the rule selecting means to extract voice output contents, voice input candidates, and designation information for designating a next processing object corresponding to each voice input candidate, from the respective sections of the obtained document specified by the rule selected by the rule selecting means. Furthermore, since *Ladd et al.* is understood not to teach or suggest the claimed document analyzing means, Applicants understand that, for at least that reason, *Ladd et al.* also does not teach or suggest the claimed voice output means or control means, each of which is defined in terms of the document analyzing means.

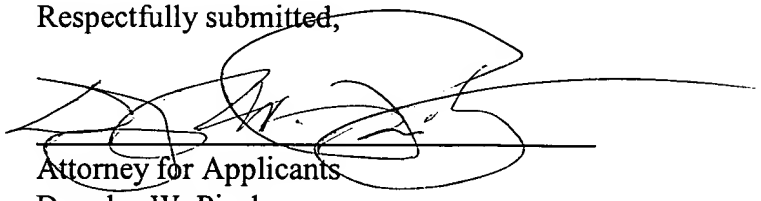
A review of the other art of record, including Applicants' admitted prior art, has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. These claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from independent Claim 1 and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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